

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS,  
DALLAS DIVISION

Hiram Patterson, Texas Division,  
Sons of Confederate Veterans, Inc.,  
Plaintiffs,

V.

Mike Rawlings,  
In His Official Capacity as  
Mayor of the City of Dallas, and  
Scott Griggs, Adam Medrano,  
Casey Thomas, II, Dwaine Caraway,  
Rickey Callahan, Omar Narvaez,  
Kevin Felder, Tennell Atkins,  
Mark Clayton, Adam McGough,  
Lee Kleinman, Sandy Greyson,  
Jennifer Gates, Philip Kingston,  
In Their Official Capacities as  
Members of the Dallas City Council,  
Defendants.

卷之三

§ Civil Action No. 3:17-CV-02361-D

**PLAINTIFFS' MEMORANDUM IN SUPPORT OF  
MOTION FOR SANCTIONS**

## EXHIBIT A

## RE: Patterson v. Rawlings: Plaintiffs' Motion for Sanctions

Rodriguez, Stacy <stacy.rodriguez@dallascityhall.com>

Tue 10/31/2017 11:46 AM

Inbox

To:David Vandenberg <davidvandenberg@hotmail.com>; Tuccelli, Leah Kay <leah.tuccelli@dallascityhall.com>; Tuccelli, Leah Kay <leah.tuccelli@dallascityhall.com>; Penney, Lisa <Lisa.Penney@dallascityhall.com>; Walker, Yvonne <yvonne.walker@dallascityhall.com>; Estee, Charles <Charles.Estee@dallascityhall.com>;

Cc:kdl@slrc-csa.org <kdl@slrc-csa.org>;

We oppose the motion on the basis that it lacks merit.

**From:** David Vandenberg [mailto:davidvandenberg@hotmail.com]

**Sent:** Tuesday, October 31, 2017 9:20 AM

**To:** Rodriguez, Stacy <stacy.rodriguez@dallascityhall.com>; Tuccelli, Leah Kay <leah.tuccelli@dallascityhall.com>; Tuccelli, Leah Kay <leah.tuccelli@dallascityhall.com>; Penney, Lisa <Lisa.Penney@dallascityhall.com>; Walker, Yvonne <yvonne.walker@dallascityhall.com>; Estee, Charles <Charles.Estee@dallascityhall.com>

**Cc:** kdl@slrc-csa.org

**Subject:** Patterson v. Rawlings: Plaintiffs' Motion for Sanctions

Good morning,

We are preparing a motion for sanctions against y'all's clients and against y'all as attorneys for the clients for not obeying the court's scheduling order, multiplying the proceeding unreasonably and vexatiously, and to enforce the court's inherent authority to regulate its docket, promote judicial efficiency, and deter frivolous filings.

We assuredly do not like making such filings and request that you withdraw your briefs that the court did not order in its scheduling order. These are the Oct. 12 Response, ECF No. 21, and your Reply of Oct. 27, ECF No. 28.

Again, we do not like to make such motions, but we are responsible for fully advocating for our clients and to assist the Court in maintaining its docket efficiently.

We wish you the very best today and look forward to hearing from you as to whether you consent or object to this motion, or if you will promptly withdraw the disputed pleadings.

Cordially,

David D. Vandenberg, Esq.  
3603D Las Colinas Drive  
Austin, Texas 78731  
(512) 373-8694

***NOTE: THE ACCOMPANYING TRANSMISSION IS CONFIDENTIAL AND PRIVILEGED INFORMATION INTENDED ONLY FOR THE NAMED RECIPIENT. IF RECEIVED IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AT OUR EXPENSE AND, UNLESS OTHERWISE INSTRUCTED, DESTROY THIS TRANSMITTAL AND ALL ACCOMPANYING MATERIALS. ANY OTHER USE, REPRODUCTION OR DISSEMINATION OF THESE MATERIALS IS PROHIBITED.***